

Message

From: Beeler, Cindy [Beeler.Cindy@epa.gov]
Sent: 11/30/2018 12:19:00 AM
To: Topinka, Natalie [topinka.natalie@epa.gov]; Vyas, Himanshu [vyas.himanshu@epa.gov]; Hambrick, Amy [Hambrick.Amy@epa.gov]; Kaleri, Cynthia [kaleri.cynthia@epa.gov]; DeFigueiredo, Mark [DeFigueiredo.Mark@epa.gov]; Weitz, Melissa [Weitz.Melissa@epa.gov]; Waltzer, Suzanne [Waltzer.Suzanne@epa.gov]; Mia, Marcia [Mia.Marcia@epa.gov]; Hoffman, Howard [hoffman.howard@epa.gov]; Gilbreath, Jan [Gilbreath.Jan@epa.gov]; Lawrence, Rob [Lawrence.Rob@epa.gov]; Thompson, Lisa [Thompson.Lisa@epa.gov]; Marsh, Karen [Marsh.Karen@epa.gov]; Witosky, Matthew [Witosky.Matthew@epa.gov]; Witt, Jon [Witt.Jon@epa.gov]; Garwood, Gerri [Garwood.Gerri@epa.gov]; Shappley, Ned [Shappley.Ned@epa.gov]; Miller, Elizabeth [Miller.Elizabeth@epa.gov]; Alsalam, Jameel [Alsalam.Jameel@epa.gov]; Sorrell, Virginia [Sorrell.Virginia@epa.gov]; Gregory, John [Gregory.John@epa.gov]; Kopits, Elizabeth [Kopits.Elizabeth@epa.gov]; Marten, Alex [Marten.Alex@epa.gov]; Branning, Amy [Branning.Amy@epa.gov]; Eisele, Adam [Eisele.Adam@epa.gov]; Macpherson, Alex [Macpherson.Alex@epa.gov]; Burden, Susan [Burden.Susan@epa.gov]; Roberts, Cindy [Roberts.Cindy@epa.gov]; Mills, Derek [Mills.Derek@epa.gov]
Subject: Re: Agenda- OG Workgroup Update (SAN 6616) - R8 OOOOa Reports CEDRI

Marcia – I realized on the call this morning you were also looking for type of facility identified from the CEDRI form (if we're still finalizing the template maybe we should add a drop down menu for facility type?).

Since you pulled OOOOa since inception (so 2017 and 2018 to-date reports), it seems by R8 numbers (below) that we're not getting them all in CEDRI, but CEDRI is not required yet. Anecdotally, folks here don't think we're receiving paper copies for all reports either. To determine from what % of our universe we're receiving reports, it would take a DrillingInfo pull – API well IDs for 1st production dates from applicable date, compiling our paper reports by company and state and then gleaning API well IDs from those and comparing. A lot of work. Can you think of a different way?

Here's how R8 submittals looked by guesstimating on Facility Name. Note that a single submitted CEDRI form could cover all of an operator's wellsites (and compressor stations?):

45	Wellsite	37	CO
17	CS	0	MT
3	Gas Plant	18	ND
1	Wellsite and CS	2	UT
		9	WY
66	TOTAL	66	TOTAL

Cindy Beeler

US EPA Region 8
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Beeler.Cindy@epa.gov

From: Topinka, Natalie

Sent: Thursday, November 29, 2018 10:31:11 AM

To: Vyas, Himanshu; Hambrick, Amy; Kaleri, Cynthia; Beeler, Cindy; DeFigueiredo, Mark; Weitz, Melissa; Waltzer, Suzanne; Mia, Marcia; Hoffman, Howard; Gilbreath, Jan; Lawrence, Rob; Thompson, Lisa; Marsh, Karen; Witosky, Matthew; Witt, Jon; Garwood, Gerri; Shappley, Ned; Miller, Elizabeth; Alsalam, Jameel; Sorrell, Virginia; Gregory, John; Kopits, Elizabeth; Marten, Alex; Branning, Amy; Eisele, Adam; Macpherson, Alex; Burden, Susan; Roberts, Cindy; Mills,

Derek

Subject: RE: Agenda- OG Workgroup Update (SAN 6616)

Following up on the agenda requests from a couple of weeks ago:

All states in Region 5 are delegated authority for NSPS implementation. See further info at this link for Illinois. Links to other states' delegation documents are on this page.

<https://www.epa.gov/il/air-standards-delegations-illinois>

Region 5 receives a very small handful of OOOO/a annual reports (on the order of 10 or so). *However, this does not affirmatively mean that reports are being sent to the states.* Aside from Ohio, there is limited oil and gas activity in the OOOO/a timeframe and scale for there to be many affected facilities in R5 states. Regarding Ohio, a majority of oil and gas entities permitted after April 2014 with Ohio's General Permit erroneously believe that language in the permit ("The permittee accepts a voluntarily limit to restrict the potential VOC emissions from each storage vessel to less than 6 tons per year") exempts them from OOOO/a applicability. Therefore, we believe that there is a large number of subject entities that are not submitting reports as they should.

I checked the table in SharePoint of CEDRI submitted reports. For the three in R5, one is definitely a well site, one is a compressor station, and the other is unclear but I presume it is a single well based on Google Maps imagery.

Also, if the group is interested, here is the result (from March 2018) of the OIG's investigation into the basis for the 2016 rule: <https://www.epa.gov/office-inspector-general/report-epa-did-not-use-allegedly-flawed-studies-estimate-methane-emissions>

Natalie

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From: Vyas, Himanshu

Sent: Thursday, November 29, 2018 10:25 AM

To: Hambrick, Amy <Hambrick.Amy@epa.gov>; Kaleri, Cynthia <kaleri.cynthia@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; DeFigueiredo, Mark <DeFigueiredo.Mark@epa.gov>; Weitz, Melissa <Weitz.Melissa@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hoffman, Howard <hoffman.howard@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Thompson, Lisa <Thompson.Lisa@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>; Shappley, Ned <Shappley.Ned@epa.gov>; Miller, Elizabeth <Miller.Elizabeth@epa.gov>; Alsalam, Jameel <Alsalam.Jameel@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Gregory, John <Gregory.John@epa.gov>; Kopits, Elizabeth <Kopits.Elizabeth@epa.gov>; Marten, Alex <Marten.Alex@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Eisele, Adam <Eisele.Adam@epa.gov>; Macpherson, Alex <Macpherson.Alex@epa.gov>; Burden, Susan <Burden.Susan@epa.gov>; Roberts, Cindy <Roberts.Cindy@epa.gov>; Mills, Derek <Mills.Derek@epa.gov>

Subject: RE: Agenda- OG Workgroup Update (SAN 6616)

Someone asked on the call about what is publicly known regarding the Policy Reconsideration Rule. The following article from Inside EPA is from the time of the Technical Reconsideration Rule proposal getting signed on Sept 11th but folks like EDF have a good idea of what is coming next.

<https://insideepa.com/daily-news/epa-proposes-ease-methane-nsps-previewing-additional-deregulation>

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From: Hambrick, Amy

Sent: Thursday, November 29, 2018 10:28 AM

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Subject: Agenda- OG Workgroup Update (SAN 6616)

Agenda

Technical Reconsideration (Karen)

- RTC
- Compliance Reports
- State Delegation

Policy Review (Amy)

- Advance status
- Reg Text

Open Discussion

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: Hambrick, Amy

Sent: Thursday, November 15, 2018 2:02 PM

To: Kaleri, Cynthia <kaleri.cynthia@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; DeFigueiredo, Mark <DeFigueiredo.Mark@epa.gov>; Weitz, Melissa <Weitz.Melissa@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hoffman, Howard <hoffman.howard@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Vyas, Himanshu <vyas.himanshu@epa.gov>; Topinka, Natalie <topinka.natalie@epa.gov>; Lawrence, Rob <Lawrence.Rob@epa.gov>; Thompson, Lisa <Thompson.Lisa@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Witosky, Matthew <Witosky.Matthew@epa.gov>; Witt, Jon <Witt.Jon@epa.gov>; Garwood, Gerri <Garwood.Gerri@epa.gov>; Shappley, Ned <Shappley.Ned@epa.gov>; Miller, Elizabeth <Miller.Elizabeth@epa.gov>; Alsalam, Jameel <Alsalam.Jameel@epa.gov>; Sorrell, Virginia <Sorrell.Virginia@epa.gov>; Gregory, John <Gregory.John@epa.gov>; Kopits, Elizabeth <Kopits.Elizabeth@epa.gov>; Marten, Alex <Marten.Alex@epa.gov>; Branning, Amy <Branning.Amy@epa.gov>; Eisele, Adam <Eisele.Adam@epa.gov>; Macpherson, Alex <Macpherson.Alex@epa.gov>; Burden, Susan <Burden.Susan@epa.gov>; Roberts, Cindy <Roberts.Cindy@epa.gov>; Mills, Derek <Mills.Derek@epa.gov>

Subject: RE: Agenda- OG Workgroup Update (SAN 6616)

Notes, from today's call with highlighted the action items. Thanks everyone! If I failed to capture something discussed, just send a holler.

TECHNICAL RECONSIDERATION

Public Hearing Report Out Details

From OAQPS Communications Staff: "We had a good turnout for the Denver public hearing on the targeted improvements to the 2016 Oil and Gas NSPS and heard from a variety of perspectives. Region 8 was a gracious host. R8 staff who volunteered as panelists and to work logistics were excellent. We appreciate all their support in making this hearing a success. Total hearing attendance: 191 (121 speakers, 70 observers). Speakers were steady in two rooms from 8-noon. We condensed to one room in the early afternoon and heard speakers steadily until 4:30. We heard from 10 speakers during the evening session from 6-8 p.m. Press in attendance included AP, Denver Post, Western Wire, Bloomberg Environment, New York Times, Denver 7 and 9 News."

From OAQPS's Karen Marsh: "Wanted to pass along a few quick notes from the hearing in case the work group asks about it today."

- 120 speakers (I think that was final count)
- Most industry representatives were supportive but raised some issues with certain parts of the proposal that they will be providing additional comment on:
 - Site-specific AMELs will stifle innovation of technologies
 - Storage vessel PTE calculation should not be individual tank-based and is inconsistent with what they have been doing
 - Recordkeeping with fugitive alternative standards (state rules) is overly burdensome because what we require in reports is different from the records states require, meaning additional records will need to be kept
- Most other speakers were in opposition of the proposal:
 - The rule was already common sense and cost-effective
 - Lots of children's health concerns (including children speakers at the hearing)
 - Lots of EJ concerns
 - Members of several different tribes attended and spoke in opposition, but one tribe spoke in support of the proposal (Ute)
 - Several speakers brought up our lack of estimation of VOC benefits and health concerns from the increased emissions
 - A few raised concerns about pumps and the technical infeasibility determination

- Some raised concerns about in-house engineers

Overall, the speakers were on topic, very well spoken and the day went smoothly. “

From OAQPS/OTAQ's Beth Miller: Sharing an article on the hearing <https://insideepa.com/daily-feed/quoted-early-views-epas-rollback-oil-gas-methane-standards>

General Discussion

- Comments received: 57 docket entries representing 14,700+ public comments. Comment period closed 12/17/2018
 - Received request to extend comment period
- Request for Karen to share the document ID numbers of the substantive comments received so far to get a head start of understanding issues people are raising
- Request for Karen to share what groups/speakers at the public hearing raised the lack of estimation of VOC benefits and health concerns from the increased emissions
- Need for ongoing group discussion on the compliance report request from EDF and OAR's initial scoping exercise from reports released under FOIA (*Please send your Region's information along if you haven't already*)
 - Robust discussion was had on what information is in the reports released under the FOIA, questions raised on how we could use the information reported, workgroup would like a better understanding of the scoping exercise of the reports released under FOIA, question raised on getting an understanding of how the new draft template is being used and understanding the scope of what is in CEDRI
 - OOOO and OOOOa state delegation
 - Which states have delegation for OOOO and OOOOa?
 - How many NSPS OOOO/OOOOa annual reports are received in your regional office? That is, do you think you are receiving all the annual reports or a portion?
 - In SharePoint,
 - https://usepa.sharepoint.com/:f:/r/sites/OAR_Custom/NSPS_OOOOa_Reconsideration_Workgroup/Shared%20Documents/Compliance%20Reports?csf=1
 - You will find a download of the submitted OOOOa reports to CEDRI(thanks Marcia!). Please highlight the ones in your region that look like well sites. This will help cull the list and we can then create a smaller list of reports which we need to download to further scope.
 - In the file on sharepoint there is also one well site report so you have an idea of what it looks like – there are tabs for each type of affected facility. There doesn't appear to be a way to capture low-production (Matt, you indicated differently, can you point to what you were referencing?).
 - FYI - You will also find a spreadsheet of the scoping exercise OAR did of the reports up to November 2017 (what was released in the FOIA <https://www.foiaonline.gov/foiaonline/action/public/submissionDetails?trackingNumber=EPA-HQ-2018-001886&type=request>) . Note this scoping was to get a sense of facility counts for purposes of trying to understand any turnover rate (policy package currently references this).

R8

OOOO

Colorado

Montana

South Dakota

Utah

Wyoming

OOOOa

Utah
Wyoming

R6

ADEQ – delegated only certain NSPS Subparts *as promulgated and amended through September 14, 1981* – so **neither NSPS Subpart OOOO nor OOOOa** are delegated at this time.

LDEQ – delegated only NSPS Subpart OOOO, as promulgated and amended through July 1, 2013.

NMED – delegated both NSPS Subparts OOOO and OOOOa, as promulgated and amended through January 15, 2017.

Albuquerque-Bernalillo County Air Quality Control Board (ABCAQCB) – delegated only NSPS Subpart OOOO, as promulgated and amended through September 13, 2013.

ODEQ – has *full automatic delegation* for NSPS, so delegated both NSPS Subparts OOOO and OOOOa, as final versions promulgated and amended to date.

TCEQ – has *full automatic delegation* for NSPS, so delegated both NSPS Subparts OOOO and OOOOa, as final versions promulgated and amended to date.

R3

Here is the rundown on NSPS OOOO and OOOOa delegations for the Region 3 states, except Delaware and DC. DC and Delaware have no current oil and gas activity so not sure you need that.

Maryland – New federal NSPS are automatically delegated to Maryland, with no further approval by EPA, as per a 1985 delegation (50 Fed Reg 34140 (8/23/1985)). So, delegated OOOO and OOOOa authority.

Virginia – Adopts new NSPS on a yearly basis by legally adopting the requirements, informing EPA of adoption, and meeting other conditions. Va has been delegated OOOO (9 VAC5-50-410 [Designated Standards of Performance]) but not all of OOOOa has been delegated to Va. As stated in a “Note” to 9VAC5-50-410, “authority to enforce [OOOOa] is being retained by EPA and it is not incorporated by reference into these regulations for any source that is not (i) a major source as defined in 9VAC5-5-80-60 and subject to Article 1 (. . . Federal Operating Permits for Stationary Sources) of Part II of 9VAC5-80 (Permits for Stationary Sources) or (ii) an affected source as defined in 9VAC5-80-370 and subject to Article 3 (9VAC5-80-360 et seq., Federal Operating Permits for Acid Rain Sources). . . . See also VAC5-50-405.B,

West Virginia – Adopts new federal NSPS on a yearly basis by incorporation by reference following notice to EPA and commitment to enforce those rules. The authority to do so is found in the WV Code of State Regulations (CSR) at 45 CSR-16-4.1, which states: “The Secretary hereby adopts and incorporates by reference the provisions of 40 CFR Parts 60 and 65, to the extent referenced in 40 CFR Part 60, . . . effective June 1, 2016 . . . except as follows: “There is no exception for OOOO or OOOOa listed, and by the text of the regulation it is clear that EPA approved the 2016 WV update. R3 is checking to see if EPA approved WVA’s incorporation by reference of NSPS enacted after June 1, 2017.

Pennsylvania: Pa automatically incorporates by reference all new NSPS with no further input/delegation from EPA, per the 1985 initial delegation (See 50 Fed Reg. 34140 , 34142 [8/23/1995]). The Pa statutory cite allowing this is 25 Pa Code 122.1 and .3. **However**, 25 Pa Code 122.2 says that the NSPS are not automatically adopted by local air pollution control agencies (Phila Air Management Services and Allegheny County Health Department) and that those local agencies may adopt or not adopt NSPS as they deem appropriate.

Philadelphia AMS – Per the initial 1985 delegation, Philadelphia AMS was also delegated authority to enforce future NSPS with no further delegation/action by EPA. See 50 Fed. Reg. 34141, 34143. So, Phila AMS should have authority to implement OOOO and OOOOa.

ACHD – ACHD also automatically incorporates by reference all NSPS adopted by EPA. Article XXI, Section 2105.05.a of the Allegheny County regulations states that “All [NSPS] now or hereafter established by the EPA at 40 CFR part 60 in accordance with Section 111 of the [CAA] are hereby incorporated by reference into this Article.” This section goes on to say that “Additions, revisions or deletions to these federal regulations . . . are incorporated into this Article and are effective on the date established by the federal regulations, unless otherwise established by regulation under this Article.” I have not found any exceptions in Article XXI limiting OOOO or OOOOa. Section 2105.110 requires that ACHD be given notice before any unconventional well activity begins.

POLICY REVIEW

Ex. 5 Deliberative Process (DP)

GENERAL WORKGROUP HOUSEKEEPING

- We’ve been typically running the call 50% technical 50% policy and adjusting the time as needed as discussion topics arise. We anticipate continuing this flow, as it seems to be working well and it is helpful as everything is intertwined. As we get more into the weeds on both rulemakings, we recognize there may be a need to either extend the duration of the workgroup call OR separate it into two calls (1 for technical, 1 for policy) in order for

everyone to have ample opportunity to weigh in and work through specific issues. If you have ideas on this, please share.

Amy Hambrick
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From: Hambrick, Amy

Sent: Thursday, November 15, 2018 10:22 AM

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Subject: RE: Agenda- OG Workgroup Update (SAN 6616) - R8 States Delegated OOOO and OOOOa

Agenda-

- Technical - public hearing report out; comments update
- Policy
 - updated advance preamble-
https://usepa.sharepoint.com/:w:/r/sites/OAR_Custom/NSPS_OOOOa_Reconsideration_Workgroup/Shared%20Documents/Policy%20Package/OG%20Policy_Draft%20Advance_10.31.2018_SPPDReview.docx?d=wd86e6263ccf84216970ddb7e33307693&csf=1
 - Reg text (includes technical reconsideration and policy)-
https://usepa.sharepoint.com/:w:/r/sites/OAR_Custom/NSPS_OOOOa_Reconsideration_Workgroup/Shared%20Documents/Policy%20Package/RLSO_ONG%20NSPS_RECONSIDERATION%20and%20REVIEW_2018.docx?d=wa7044484f9844653b11471a4f9a2d373&csf=1
- Open Discussion
 - Compliance reports/ Follow up delegated authorities

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(919)541-0964

From: Kaleri, Cynthia

Sent: Tuesday, November 13, 2018 4:19 PM

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Subject: RE: Agenda- OG Workgroup Update (SAN 6616) - R8 States Delegated OOOO and OOOOa

Here's the specific details for R6 delegated authorities:

ADEQ – delegated only certain NSPS Subparts *as promulgated and amended through September 14, 1981* – so **neither NSPS Subpart OOOO nor OOOOa** are delegated at this time.

LDEQ – delegated only NSPS Subpart OOOO, as promulgated and amended through July 1, 2013.

NMED – delegated both NSPS Subparts OOOO and OOOOa, as promulgated and amended through January 15, 2017.

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TCEQ – has full automatic delegation for NSPS, so delegated both NSPS Subparts OOOO and OOOOa, as final versions promulgated and amended to date.

Hope this helps!

Cynthia J. Kaleri

Enforcement Officer, EPA Region 6

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Mailing Address

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From: Hambrick, Amy

Sent: Thursday, November 8, 2018 10:46 AM

To: Beeler, Cindy <Beeler.Cindy@epa.gov>; DeFigueiredo, Mark <DeFigueiredo.Mark@epa.gov>; Weitz, Melissa <Weitz.Melissa@epa.gov>; Waltzer, Suzanne <Waltzer.Suzanne@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hoffman, Howard <hoffman.howard@epa.gov>; Gilbreath, Jan <Gilbreath.Jan@epa.gov>; Vyas, Himanshu

ED_004016P_00000779-00009

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Subject: RE: Agenda- OG Workgroup Update (SAN 6616) - R8 States Delegated OOOO and OOOOa

All- Thanks for the robust discussion today. Per discussion on today's call this email includes a link to the FOIA online OOOOa reports released, the new draft CEDRI reporting template for OOOOa reporting, the paragraph in the policy package that references the compliance reports, and request for comment period extension on technical proposal . Regions, please respond to this email within the next week or so identifying which states in your regions have delegated authority for OOOO and OOOOa (Thanks to Cindy for sending R8s).

Compliance Reports Release Under FOIA:

<https://www.foiaonline.gov/foiaonline/action/public/submissionDetails?trackingNumber=EPA-HQ-2018-001886&type=request>

CEDRI OOOOa draft report: <https://www.regulations.gov/document?D=EPA-HQ-OAR-2017-0483-0004>

Request for comment period extension on technical proposal comment period (attached)

PARAGRAPH IN POLICY PACKAGE THAT REFERENCES COMPLIANCE REPORTS IN CONTEXT OF EXISTING SOURCE TURNOVER TO NEW SOURCES (see advance draft link below for full draft package)

"Compliance Reports. The EPA reviewed all NSPS OOOOa compliance reports that had been submitted to the Agency through November 21, 2017, in order to identify information to use to develop a rate at which existing facilities become new or modified.⁽¹⁾ Information in these compliance reports indicates the number of various types of facilities subject to the NSPS during the given time range. The reports included 2,991 well sites, encompassing 697 storage vessels, 5 pneumatic controllers, 663 pneumatic pumps, and 2,091 instances of fugitive emissions monitoring. 130 compressor stations were included in the reports, encompassing 148 reciprocating compressors and 94 instances of fugitive emissions monitoring. In addition, 38 natural gas processing plants were included, encompassing 1 pneumatic controller and 32 reciprocating compressors. The reports included both new and existing facilities, which we can disaggregate in part by subtracting our previous estimates of the number of "new" facilities from these counts which include both new and modified. A high rate of turnover (e.g., a high rate of facilities performing modification(s) which caused them to become subject to the 2016 NSPS OOOOa) would imply that a large number of facilities should be submitting compliance reports. Thus, the general proportions of the number of facilities in the compliance reports versus the total population indicateshow quickly facilities became subject to the NSPS during this period. Due to various uncertainties, we are unable to develop a rate at which existing sources become subject to the NSPS OOOOa. The EPA solicits comment on ways to use this information to predict turnover trends."

OOOO and OOOOa state delegation

OOOO

Colorado

Montana

South Dakota

Utah

Wyoming

OOOOa

Utah
Wyoming

Amy Hambrick
U.S. Environmental Protection Agency
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From: Beeler, Cindy
Sent: Thursday, November 08, 2018 11:18 AM
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Subject: RE: Agenda- OG Workgroup Update (SAN 6616) - R8 States Delegated OOOO and OOOOa

FYI ...
Here is a breakdown of the states that have incorporated by reference OOOO and OOOOa.

OOOO
Colorado
Montana
South Dakota
Utah
Wyoming

OOOOa
Utah
Wyoming

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US EPA Region 8
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Subject: Agenda- OG Workgroup Update (SAN 6616)

AGENDA-

- Technical - public hearing Nov. 14, 8a-8pm in Denver. <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/forms/public-hearing-proposed-improvements>
- Policy
updated advance preamble-
https://usepa.sharepoint.com/:w:/r/sites/OAR_Custom/NSPS_OOOOa_Reconsideration_Workgroup/Shared%20Documents/Policy%20Package/OG%20Policy_Draft%20Advance_10.31.2018_SPPDReview.docx?d=wd86e6263ccf84216970ddb7e33307693&csf=1
Reg text (includes technical reconsideration and policy)-
https://usepa.sharepoint.com/:w:/r/sites/OAR_Custom/NSPS_OOOOa_Reconsideration_Workgroup/Shared%20Documents/Policy%20Package/RLSO_ONG%20NSPS_RECONSIDERATION%20and%20REVIEW_2018.docx?d=wa7044484f9844653b11471a4f9a2d373&csf=1
- Open Discussion

Amy Hambrick
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^[1] These reports have since been made available for public viewing at
<https://www.foiaonline.gov/foiaonline/action/public/submissionDetails?trackingNumber=EPA-HQ-2018-001886&type=request>

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